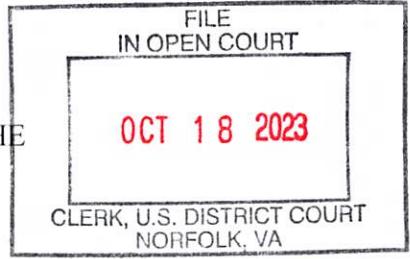


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION



UNITED STATES OF AMERICA

v.

Case No. 2:23-cr-108

TYLER RUSSELL SEVIN

Defendant.

STATEMENT OF FACTS

The United States and the defendant, TYLER RUSSELL SEVIN (hereinafter, “the defendant”), agree that at trial, the United States would have proven the following facts beyond a reasonable doubt with admissible and credible evidence:

1. In February 2023, law enforcement, in an undercover capacity, found a user on a peer-to-peer (P2P) BitTorrent network sharing images of children engaged in sexually explicit conduct (child sexual abuse material or “CSAM”). The user was utilizing IP Address 173.50.100.187 (the Target IP Address) and was sharing a known torrent file. This torrent file referenced 4,461 files, at least one of which was identified as being a file containing CSAM.

2. Using a computer running investigative BitTorrent software, a direct connection was made to the device at the Target IP Address (the “Suspect Device”). The Suspect Device reported it was using BitTorrent client software—BW130Elibtorrent/1.2.2.0.

3. On February 14, 2023, law enforcement downloaded approximately 152 files that the Suspect Device at the Target IP Address made available. The Suspect Device at the Target IP Address was the sole candidate for each download, and each file was downloaded directly from the Target IP Address and the Subject Device.

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4. Using publicly available search tools, law enforcement determined that the Target IP Address was controlled by Internet Service Provider Verizon Fios. Administrative subpoenas were obtained for subscriber information associated with the Target IP Address, and on or about March 1, 2023, Verizon Fios identified the customer to be a relative of TYLER RUSSELL SEVIN at their mutual residence in Virginia Beach, Virginia 23455 (“the Virginia Beach Residence”), which is within the Eastern District of Virginia, and that the Target IP Address was active on the date of the subpoena return.

5. On April 11, 2023, members of the Virginia Beach Police Department Special Investigations Unit executed a lawfully-issued state search warrant at the Virginia Beach Residence and associated vehicles. TYLER RUSSELL SEVIN was present and read his *Miranda* rights, agreed to an interview, and confessed to downloading CSAM on his computer at his residence. TYLER RUSSELL SEVIN also admitted he had been struggling with CSAM for about a period of one year but denied having CSAM on other devices of his.

6. Law enforcement seized numerous electronic and computer devices belonging to TYLER RUSSELL SEVIN during the search, all of which were manufactured outside of Virginia. Despite denying possessing CSAM on other devices, forensic analysis determined that BitTorrent was installed on TYLER RUSSELL SEVIN’s computer and that his Apple iPhone contained numerous files of CSAM.

7. The investigation and forensic analysis of the devices of TYLER RUSSELL SEVIN prove beyond a reasonable doubt that, from on or about February 14, 2023, to on or about February 22, 2023, in Virginia Beach, Virginia, within the Eastern District of Virginia, SEVIN knowingly received a visual depiction using a means and facility of interstate and foreign commerce, or that had been mailed, shipped, and transported in and affecting interstate and foreign

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commerce, or which contained materials which had been mailed and so shipped and transported, by any means including by computer. An example of such visual depiction includes CSAM of a nude, prepubescent female, who appears approximately seven to eight years of age, sitting on a chair completely nude with her legs spread apart exposing her vagina. Another example includes CSAM of a nude prepubescent female, approximately seven to nine years old, sitting on the ground with her legs spread open exposing her vagina.

8. SEVIN received the images via the Internet, which is an interconnected network of computers with which one communicates when on-line, is a network that crosses state and national borders, and is a facility of interstate and foreign commerce.

9. The defendant knew that some of the visual depictions described herein and other images involved in this conduct were images depicting actual minors engaging in sexually explicit conduct.

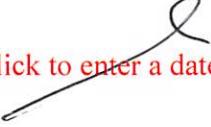
10. The actions of the defendant, as recounted above, were in all respects knowing and deliberate, and were not committed by mistake, accident, or other innocent reason.

11. The defendant acknowledges that the foregoing statement of facts does not describe all of the defendant's conduct relating to the offense charged in this case, nor does it identify all of the persons with whom the defendant may have engaged in illegal activities.

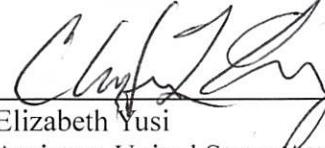
Respectfully submitted,

Jessica D. Aber
United States Attorney

Date: [Click to enter a date.](#)


October 18, 2023

By:


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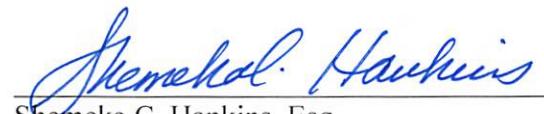

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After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, TYLER RUSSELL SEVIN, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.



TYLER RUSSELL SEVIN

I am Shemeka C. Hankins, defendant's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.



Shemeka C. Hankins, Esq.
Attorney for TYLER RUSSELL SEVIN